JLMEDIA INC.
RADIO | TELEVISION | PRINT | OUT-OF-HOME | DIGITAL

Effective Media Solutions

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
The Portals Building, Room TW-B204
445-12th Street, S.W.
Washington, D.C. 20554

Re: Review of Local Radio Ownership Rules - Embedded Radio Markets
MB Docket Nos. 09-182 and 14-50

Dear Ms. Dortch:

I write this letter as the Director of Client Services for JL Media, Inc., an integrated media buying company headquartered in Union, New Jersey, to support the proposal of Connoisseur Media, LLC to change the FCC's rules on the ownership of broadcast stations in embedded markets. Our company works with our clients to craft the best advertising solutions for their businesses. In doing so, we regularly buy radio advertising in the New York City area, where we are one of the largest spenders in the marketplace, I am very familiar with radio advertising in the area as I am in the marketplace daily, including in the embedded markets. As set forth below, allowing a company like Connoisseur to buy stations in multiple embedded markets would be advantageous to media buyers, and would not impede competition in these markets. We would urge the FCC to allow companies like Connoisseur to own stations in multiple embedded markets.

First, we agree with Connoisseur that stations in one embedded market do not compete with those in other embedded markets. Stations in Long Island have nothing to do with the Monmouth-Ocean market, and those in Monmouth-Ocean don't compete with stations in the Hudson Valley markets. Nor do listeners located in one of these markets typically listen to stations located in another. When our company wants to run an efficient advertising campaign for a business located in one of these embedded markets, we would buy ads on stations in that embedded market who target their local audience, not on some station in an adjacent embedded market. The stations in these markets give us a great way to reach a specific population for a local client without having our message running in an area that our client will never draw business from. We treat each of these embedded markets and stations in them as their own not connected to each other in any way.

Nor do combinations of embedded market stations pose any competitive threat in the greater New York market. Stations that operate in the core of the New York City market reach listeners both in the core of the New York market and also in the outlying communities in the embedded markets. The stations in the core of the market are relevant to suburban listeners, as many residents in those suburban counties commute to the core of the market for work or play, and many identify with New York because of the TV stations, sports teams and other institutions in the city provides ties throughout the greater New York metropolitan area. Thus, for an advertiser with locations throughout the metropolitan area, the central city stations offer an advertising solution. I presume that it was because of the impact that these core stations have in the embedded markets that the FCC adopted the current rules establishing the current ownership limits, not wanting the owner of stations in the core of the market to also own stations in the embedded markets. I agree with the full market owners not being able to buy into the smaller markets, but I strongly disagree with those who own in the markets that have signals that don't cover it fully being restricted from buying stations in the markets they don't reach.

Stations located in the embedded markets, however, have neither the coverage nor the audience to attract listeners outside of their own local markets. Given their more limited coverage areas, their programming is concentrated on their local markets and the listeners in those markets, offering little attraction to listeners in other parts of the metropolitan area (even to those areas where their signal might be heard). Advertisers who want to reach the entire New York market would typically not reach out to an owner of stations in any single embedded market, as those stations simply do not offer the broad audience that a regional or national advertiser needs.

Allowing a company like Connoisseur to own stations in multiple embedded markets could, however, provide efficiencies both for advertisers and station operators. There are some regional advertisers who have businesses that serve multiple suburbs of New York, but don't need to use the high-priced central city stations to reach the central city or the entire market. The one-stop shopping that would be offered by an owner with stations in multiple embedded markets would be attractive to that kind of advertiser. Even some advertisers who serve the entire metropolitan area might find that an owner with stations reaching people in multiple embedded markets to be an attractive alternative to buying the central city stations, giving that station owner the ability to compete for advertising that they currently could not get.

Thus, I support the call for a change in the ownership rules that would allow one company to own stations in multiple embedded markets, and urge the Commission to act on it as soon as possible. I believe that both advertisers and listeners would benefit from the rule changes that Connoisseur Media has proposed regarding ownership of stations in these markets.

Sincerely,

Rich Russo
Director of Client Services

JL MEDIA, INC.
1600 Route 22
Union, New Jersey 07083
908.687.8700 Main Phone
908.687.9280 fax